

# **EXHIBIT 11**

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Co-Liaison Counsel and Executive Committee Members for the Class

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

In re NOVO NORDISK SECURITIES	)	Master File No. 3:17-cv-00209-ZNQ-
LITIGATION	)	LHG
_____	)	
This Document Relates To:	)	<u>CLASS ACTION</u>
	)	
ALL ACTIONS.	)	
_____	)	

DECLARATION OF JENNIFER SCULLION  
FILED ON BEHALF OF SEEGER WEISS  
IN SUPPORT OF APPLICATION FOR  
AWARD OF ATTORNEYS' FEES AND EXPENSES

I, Jennifer Scullion, declare as follows:

1. I am Partner at the Seeger Weiss LLP law firm (the “Firm”). I am submitting this declaration in support of the application for an award of attorneys’ fees and expenses/charges (“expenses”) in connection with services rendered in the above-entitled action.

2. This Firm is Co-Liaison counsel of record for the Plaintiff Class and Liaison Counsel for class representative Central States, Southeast and Southwest Areas Pension Fund.

3. The information in this declaration regarding the Firm’s time and expenses is taken from time and expense reports and supporting documentation prepared and/or maintained by the Firm in the ordinary course of business. I am the partner who conducted the day-to-day activities in the litigation and I reviewed these reports (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. Based on this review and the adjustments made, I believe that the time reflected in the Firm’s lodestar calculation and the expenses for which payment is sought herein

are reasonable and were necessary for the effective and efficient prosecution and resolution of the litigation.

4. After the reductions referred to above, the number of hours spent on the litigation by my Firm is 343. A breakdown of the lodestar is provided in **Exhibit A**. The lodestar amount for attorney/paralegal (or attorney/paraprofessional) time based on the Firm's current rates is \$185,911.50 (except that, for personnel who are no longer employed by the Firm, the "current rate" used for the lodestar calculation is based upon the rate for that person in his or her final year of employment with the Firm). The hourly rates shown in **Exhibit A** are consistent with hourly rates submitted by the Firm in other securities class action litigation. The Firm's rates are set based on periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side. Different timekeepers within the same employment category (*e.g.*, partners, associates, paralegals, etc.) may have different rates based on a variety of factors, including years of practice, years at the Firm, years in the current position (*e.g.*, years as a partner), relevant experience, relative expertise, and the rates of similarly experienced peers at this Firm or other firms.

5. My Firm seeks an award of \$2,012.85 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in **Exhibit B**.

6. The following is additional information regarding certain of these expenses:

(a) Transportation: \$300. In connection with the prosecution of this case, the Firm has paid for local travel expenses to, among other things, attend court hearings and mediations. The date, destination and purpose of each trip is set forth in **Exhibit C**.

(b) Photocopies: \$1,702.25. In connection with this case, the Firm made 6,809 in-house photocopies (6,803 black and white and 6 color), charging \$0.25 per copy for a total of \$1,702.25. Each time an in-house copy machine is used, our billing system requires that a case or administrative billing code be entered and that is how the 6,809 copies were identified as related to this case.

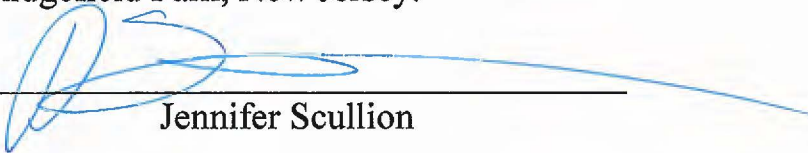
(c) Online Research: \$10.60. This category includes vendors such as Westlaw and PACER. These resources were used to obtain access to filings and legal research. This expense represents the expense incurred by the Firm for use of these services in connection with this litigation. The charges for these vendors vary depending upon the type of services requested.

7. The expenses pertaining to this case are reflected in the books and records of this Firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

8. The identification and background of my Firm and its partners is attached hereto as **Exhibit D**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of May, 2022, at Ridgefield Park, New Jersey.

  
\_\_\_\_\_  
Jennifer Scullion

# EXHIBIT A

**EXHIBIT A**

*In re Novo Nordisk Securities Litigation*, No. 3:17-cv-00209-ZNQ-LHG  
 Seeger Weiss  
 Inception through April 30, 2022

<b><u>Timekeeper</u></b>	<b><u>Title</u></b>	<b><u>Rates</u></b>	<b><u>Total Hours</u></b>	<b><u>Total Amount</u></b>
Christopher A. Seeger	Partner	\$ 985.00	82.6	\$ 81,361.00
Christopher Ayers	Partner	\$ 875.00	2	\$ 1,750.00
Jennifer Scullion	Partner	\$ 950.00	44.5	\$ 42,275.00
David Tawil	Associate	\$ 675.00	2	\$ 1,350.00
Kseniya Lezhnev	Associate	\$ 375.00	4.2	\$ 1,575.00
Leslie Kramer	Paralegal	\$ 275.00	14.6	\$ 4,015.00
Margaret Hernandez	Paralegal	\$ 275.00	16.8	\$ 4,620.00
Michael Sheridan	Paralegal	\$ 275.00	158.4	\$ 43,560.00
Natasha McLean	Paralegal	\$ 215.00	0.2	\$ 43.00
Robert Hrouda	Paralegal	\$ 275.00	0.3	\$ 82.50
Sabrina Tyjer	Paralegal	\$ 275.00	7.5	\$ 2,062.50
Scott Siegel	Paralegal	\$ 325.00	9.9	\$ 3,217.50
		TOTALS	343	\$ 185,911.50



# EXHIBIT B

**EXHIBIT B**

*In re Novo Nordisk Securities Litigation*, No. 3:17-cv-00209-ZNQ-LHG  
Seeger Weiss  
Inception through April 30, 2022

<b><i>CATEGORY</i></b>		<b><i>AMOUNT</i></b>
Local Travel/Taxis		\$300
Photocopies		
In-House: (6,809 copies at \$0.25 per page)		\$1,702.25
Online Legal and Financial Research		\$10.60
<b><i>TOTAL</i></b>		<b>\$2,012.85</b>

# EXHIBIT C

**EXHIBIT C**

*In re Novo Nordisk Securities Litigation*, No. 3:17-cv-00209-ZNQ-LHG  
Seeger Weiss

Local Travel/Taxis: \$300

<b><i>NAME</i></b>	<b><i>DATE</i></b>	<b><i>DESTINATION</i></b>	<b><i>PURPOSE</i></b>
Christopher Seeger	July 25, 2018	Trenton	Attend court conference
Christopher Seeger	November 19, 2018	Trenton	Attend court conference
Christopher Seeger	September 2, 2021	New York	Attend mediation

# EXHIBIT D



### **Firm Overview**

Seeger Weiss is one of the preeminent trial law firms in the nation, known for its high-stakes, landmark verdicts and settlements in multidistrict mass tort and class action litigation on behalf of consumers, athletes, farmers, municipalities, and other injured parties. Headquartered in Ridgefield Park, New Jersey, the firm has led and tried some of the most complex and high-profile litigations in the U.S. in both state and federal courts, including multiple bellwether trials, since its founding in 1999.

### **Professionals**

Managing Partner(s): Christopher A. Seeger, Stephen A. Weiss, David R. Buchanan

Number of partners: 12

Number of lawyers: 40

Languages: English, Hindi, Korean, Russian, Spanish, Urdu

### **Offices**

55 Challenger Road, Suite 600  
Ridgefield Park, New Jersey 07660

100 Church Street  
New York, New York 10007

1515 Market Street, Suite 1380  
Philadelphia, Pennsylvania 19102

### **Representative Matters**

#### **Consumer Protection/Product Liability:**

- *In re 3M Combat Arms Earplug Prods. Liab. Litig.*: Co-Lead Counsel prosecuting product liability claims arising from medical product.
- *In re American Medical Collection Agency, Inc. Customer Data Security Breach Litig.*: Co-lead Counsel (Quest Track) in class action prosecuting consumer data privacy claims.
- *In re Intel Corp. CPU Mktg., Sales Practices and Prods. Liab. Litig.*: Co-Lead Counsel prosecuting consumer fraud, product defect and related claims.
- *In re Davol, Inc./C.R. Bard Inc. Polypropylene Hernia Mesh. Prods. Liab. Litig.*: Executive Committee prosecuting product liability claims arising from medical product.
- *Volkswagen "Clean Diesel" Marketing, Sales Practices and Prods. Liab. Litig.*: Steering Committee. Over \$20 billion settlement on behalf of over 500,000 plaintiffs.

- *In re Mercedes-Benz Emissions Litig.*: Co-Counsel prosecuting class action alleging consumer fraud, RICO, and related claims.
- *Fenner v. General Motors Co.*: Co-Counsel prosecuting class action alleging consumer fraud, RICO, and related claims.
- *In re Syngenta AG MIR 162 Corn Litig.*: Member of Plaintiffs' Executive Committee that obtained certification of 8 statewide and 1 nationwide class, and Member of Plaintiffs' Settlement Negotiating Committee & principal negotiator. \$1.51 billion nationwide settlement.
- *In re FieldTurf Artificial Turf Mktg. & Sales Litig.*: Co-Lead Counsel prosecuting fraud, product defect, and related claims.
- *Chinese-Manufactured Drywall Prods. Liab. Litig.*: Lead trial counsel & Trial Committee chair. Over \$1 billion settlement on behalf of nearly 5,000 plaintiffs.
- *Depuy Orthopaedics, Inc. ASR Hip Implant Prods. Multidistrict Litig.*: Executive Committee. \$2.5 billion settlement.

#### **Opioids Liability:**

- *In re Nat'l Prescription Opiate Litig.*: Plaintiffs' Executive Committee prosecuting nuisance, negligence, fraud, and related claims.
- *Bergen County v. Purdue Pharma, L.P., et al.*: Co-counsel prosecuting nuisance, negligence, fraud, and related claims.
- *Camden County v. Purdue Pharma, L.P., et al.*: Co-counsel prosecuting nuisance, negligence, fraud, and related claims.
- *Essex County v. Purdue Pharma, L.P., et al.*: Co-counsel prosecuting nuisance, negligence, fraud, and related claims.
- *City of Jersey City v. Purdue Pharma, L.P., et al.*: Co-counsel prosecuting nuisance, negligence, fraud, and related claims.
- *Township of Bloomfield v. Purdue Pharma, L.P., et al.*: Co-counsel prosecuting nuisance, negligence, fraud, and related claims.
- *Township of Irvington v. Purdue Pharma, L.P., et al.*: Co-counsel prosecuting nuisance, negligence, fraud, and related claims.

#### **Personal Injury:**

- *In re NFL Players' Concussion Injury Litig.*: Co-lead counsel & chief negotiator. Over \$1 billion uncapped settlement fund plus medical testing program on behalf of over 20,000 plaintiffs.
- *Wildcats Bus Crash Litig.*: Lead counsel. \$2.25 million verdict followed by \$36 million settlement on behalf of 11 plaintiffs.

#### **Drug Injury:**

- *In re Proton-Pump Inhibitor Prods. Liab. Litig. (No. II)*, MDL No. 2789 (D.N.J.): Co-Lead Counsel representing individuals injured by gastric acid reduction medication.
- *In re Testosterone Replacement Therapy Prods. Liab. Litig.*: Co-lead counsel & lead trial counsel representing individuals injured by testosterone medication.
- *In re Invokana Prods. Liab. Litig.*: Co-lead counsel representing individuals injured by diabetes medication.

- *Vioxx Prods. Liab. Litig.*: Co-lead counsel. \$4.85 billion global settlement on behalf of more than 45,000 plaintiffs in approximately 27,000 claims.
- *Zyprexa Prods. Liab. Litig.*: Liaison counsel. \$700 million first-round settlement and \$500 million second-round settlement.
- *Kendall v. Hoffman-La Roche, Inc.*: Co-trial counsel. \$10.6 million verdict on behalf of plaintiff.
- *McCarrell v. Hoffman-La Roche, Inc.*: Liaison counsel. \$25.16 million verdict on behalf of plaintiff.
- *Rossitto & Wilkinson v. Hoffmann La Roche, Inc.*: Lead trial counsel. \$18 million verdict on behalf of two plaintiffs.
- *Accutane Litigation*: Lead trial counsel. \$25.5 million verdict on behalf of plaintiff.
- *Humeston v. Merck & Co.*: Co-trial counsel. \$47.5 million verdict on behalf of plaintiff.
- *Vytorin/Zetia Marketing, Sales Practices and Prods. Liab. Litig.*: Co-liaison counsel & principal negotiator. \$41.5 million settlement.
- *Phenylpropanolamine (PPA) Prods. Liab. Litig.*: Co-lead counsel & principal negotiator. \$41.5 million nationwide settlement.

**Antitrust:**

- *In re German Automotive Mfrs. Antitrust Litig.*: Plaintiffs' Steering Committee prosecuting consumer antitrust claims.
- *In re Liquid Aluminum Sulfate Antitrust Litig.*: Plaintiffs' Steering Committee prosecuting antitrust class action on behalf of water treatment chemical purchasers.
- *In re Polyurethane Foam Antitrust Litig.*: Executive Committee. Approximately \$428 million settlement on behalf of plaintiffs.

**Toxic Exposure:**

- *Bayer CropScience Rice Contamination MDL*: Executive Committee. \$750 million settlement.
- *"StarLink" Corn Products Litig.*: Co-lead counsel. \$110 million settlement.
- *Owens v. ContiGroup Companies*: Lead trial counsel. \$11 million settlement for 15 plaintiffs.